

C. Brandon Wisoff (State Bar No. 121930)  
bwisoff@fbm.com  
Thomas B. Mayhew (State Bar No. 183539)  
tmayhew@fbm.com  
FARELLA BRAUN + MARTEL LLP  
235 Montgomery Street, 17th Floor  
San Francisco, CA 94104  
Telephone: (415) 954-4400  
Facsimile: (415) 954-4480

Attorneys for Defendant  
ELECTROLUX HOME PRODUCTS INCORPORATED

UNITED STATES DISTRICT COURT OF CALIFORNIA

EASTERN DISTRICT

ROBERT BOVERO,

Plaintiff,

v.

ELECTROLUX HOME PRODUCTS  
INCORPORATED,

Defendant.

Case No. 2:13-cv-00087-WBS-AC

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTEND TIME TO  
RESPOND TO INITIAL COMPLAINT  
AND FIRST AMENDED COMPLAINT  
(L.R. 144)**

Complaint served: Jan. 17, 2013  
Current response date: Feb. 7, 2013  
New response date: March 29, 2013

Plaintiff ROBERT BOVERO ("Plaintiff") and Defendant ELECTROLUX HOME PRODUCTS INCORPORATED ("Electrolux"), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, on January 16, 2013, Plaintiff filed his initial Complaint in this action;

WHEREAS, on January 17, 2013, Plaintiff served Electrolux with a copy of the initial Complaint and Summons in a Civil Action;

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a), Electrolux currently must file and serve a response to Plaintiffs' initial Complaint on or before February 7, 2013;

WHEREAS, the parties have not yet obtained any extensions as to Electrolux's time to file and serve a response to Plaintiff's initial Complaint;

WHEREAS, Plaintiff has notified Electrolux that he intends to file a First Amended Complaint on or before March 1, 2013 to, at a minimum, add a claim for damages to his cause of action under the California Consumers Legal Remedies Act ("CLRA");

WHEREAS, Electrolux does not wish to incur, and Plaintiff does not wish to cause Electrolux to incur, any burden or expense in responding to the Complaint now on file that will be superseded by the First Amended Complaint when it is filed;

WHEREAS, Electrolux also has requested from Plaintiff additional time to prepare a response to Plaintiff's forthcoming First Amended Complaint, which Plaintiff intends to file on or before March 1, 2013;

WHEREAS both parties have agreed that good cause exists to extend the time for Electrolux to respond to Plaintiff's contemplated First Amended Complaint to and including March 29, 2013 (28 days after Plaintiff intends to file a First Amended Complaint);

NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE THAT (1) Plaintiff shall file his First Amended Complaint on or before March 1, 2013; (2) Electrolux need not respond to the Complaint currently on file; and (3) Electrolux shall have to and including March 29, 2013, to move, answer, or otherwise respond to Plaintiff's First Amended Complaint

IT IS SO STIPULATED.

Dated: January 30, 2013

FARELLA BRAUN + MARTEL LLP

By: /s/ C. Brandon Wisoff  
C. Brandon Wisoff

Attorneys for Defendant  
ELECTROLUX HOME PRODUCTS INC.

Dated: January 30, 2013

EPPSTEINER & FIORICA ATTORNEYS, LLP

By: /s/ Stuart M. Eppsteiner  
Stuart M. Eppsteiner  
(as authorized on January 30, 2013)

Attorneys for Plaintiff ROBERT BOVERO, on  
behalf of himself and those similarly situated

**ORDER**

IT IS SO ORDERED.

Dated: February 26, 2013



WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE